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7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**

2:24-cr-00242-JAD-BNW

9 UNITED STATES OF AMERICA,

Case No. 2:24-cr-00242-JAD-BNW

10 Plaintiff,

11 v.

12 FERNANDO ORTEGA-HERNANDEZ,
aka "Ortega Fernando,"
13 aka "Hernandez Fernando,"

**Stipulation for an Order
Directing Probation to Prepare
a Criminal History Report**

14 Defendant.

16 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M.

17 Frierson, United States Attorney, and Clay Plummer, Special Assistant United States
18 Attorney, counsel for the United States of America, Rene L. Valladares, Federal Public
19 Defender, and Rick Mula, Assistant Federal Public Defender, counsel for
20 defendant FERNANDO ORTEGA-HERNANDEZ, that the Court direct the U.S.
21 Probation Office to prepare a report detailing the defendant's criminal history.

22 This stipulation is entered into for the following reasons:

23 1. The United States Attorney's Office has developed an early disposition
24 program for immigration cases, authorized by the Attorney General pursuant to the

1 PROTECT ACT of 2003, Pub. L. 108-21. Pursuant to this program, the government has
2 extended to the defendant a plea offer in which the parties would agree to jointly request an
3 expedited sentencing immediately after the defendant enters a guilty plea.

4 2. The U.S. Probation Office cannot begin obtaining the defendant's criminal
5 history until after the defendant enters his guilty plea unless the Court enters an order
6 directing the U.S. Probation Office to do so. Such an order is often entered in the minutes of
7 a defendant's initial appearance when charged by indictment.

8 3. The U.S. Probation Office informs the government that it would like to begin
9 obtaining the criminal history of defendants eligible for the early disposition program as
10 soon as possible after their initial appearance so that the Probation Office can complete the
11 Presentence Investigation Report by the time of the expected expedited sentencing.

12 4. Accordingly, the parties request that the Court enter an order directing the
13 U.S. Probation Office to prepare a report detailing the defendant's criminal history.

DATED this 15th day of ~~July~~, 2024.

Respectfully Submitted,

RENE L. VALLADARES
Federal Public Defender

JASON M. FRIERSON
United States Attorney

/s/ 

/s/ Clay Plummer
CLAY A PLUMMER
Assistant United States Attorneys

1
2 **UNITED STATES DISTRICT COURT**
3 **DISTRICT OF NEVADA**

2:24-cr-00242-JAD-BNW

3 **Case No. 2:24-mj-00639-MDC**

4 UNITED STATES OF AMERICA,

5 Plaintiff,

6 v.

7 FERNANDO ORTEGA-HERNANDEZ,
8 aka "Ortega Fernando,"
9 aka "Hernandez Fernando,"

10 Defendant.

11 **Order Directing Probation to
12 Prepare a Criminal History Report
13 [Proposed]**

14 Based on the stipulation of counsel, good cause appearing, and the best interest of
15 justice being served:

16 IT IS HEREBY ORDERED that the U.S. Probation Office is directed to prepare a
17 report detailing the defendant's criminal history.

18 October
19 DATED this 21st day of July, 2024.

20
21 _____
22 HON. MAXIMILIANO D'COUVILLIER, III
23 UNITED STATES MAGISTRATE JUDGE
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